SECTION 2.6

SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES RESULTING FROM PROJECT IMPLEMENTATION

2.6 <u>Significant Irreversible Environmental Changes Resulting from Project Implementation</u>

CEQA requires the evaluation of significant irreversible environmental changes of the proposed project. Specifically, CEQA Guidelines Section 15126.2(c) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The proposed project would irreversibly alter the vacant undeveloped site, committing it to residential, commercial, and open space uses for the foreseeable future. However, this is not considered significant since the project site is in an area designated in the County of San Diego General Plan for residential, industrial, and commercial development.

The proposed project would result in the following irreversible impacts during construction and post-construction occupancy:

- Increased requirements of public services and utilities by the project, representing a permanent commitment of these resources
- Consumption of natural renewable and non-renewable resources, such as fossil fuels consumed by project-generated traffic, electricity, natural gas, and potable water supply
- Alteration of the availability of mineral resources.

Public Services and Utilities

Service providers have indicated that, with implementation of infrastructure improvements discussed in Section 4.1 of the EIR, there will be an adequate supply of energy, water, and wastewater resources to the proposed project, and fire protection, police protection, emergency medical service, and solid waste services will be provided (see Section 4.1.2 of the EIR, "Utilities and Public Services").

Consumption of Resources

Various non-renewable natural resources would be used for project construction and operations; resources would include diesel, gasoline, or oil for construction equipment and natural gas or other fossil fuels used to provide power and heating sources to buildings and lighting within the

proposed project. Non-renewable resources are considered to be commodities that are available in a finite supply and include natural gas, petroleum products, asphalt, petrochemical construction materials, steel, copper and other metals, and sand and gravel. The processes that created these resources occur over a long period of time, and the replacement of these resources would not occur over the life of the project. To varying degrees, the aforementioned materials are readily available; some materials, such as asphalt or sand and gravel, are abundant. Other commodities, such as metals, natural gas, and petroleum products, are also readily available, but they are finite in supply given the length of time required by the natural process to create them.

If not consumed by the proposed project, these resources would likely be committed to other projects in the region intended to meet growth. Furthermore, the investment of resources in the proposed project would be typical of the level of investment normally required for commercial and residential uses of this scale. Mitigation measures have been included in this EIR to reduce and minimize to the fullest extent the impact to renewable and non-renewable resources.

The proposed project shall be constructed using low-sulfur diesel fuel, as mandated by the ARB. Low-sulfur diesel fuels are expected to be readily available on the market in 2007. Idling times for construction equipment would be reduced, taking into account the requirements for startup of heavy equipment.

The commitment of resources outlined above and the levels of consumption with the proposed project are consistent with and would represent a small percentage of planned future development within the County of San Diego. Therefore, there is no particular justification for avoiding or delaying the continued commitment of these resources.

Mineral Resources

The proposed project would provide a Biological Open Space and result in a loss of availability of mineral resources. The lost potential to extract these resources represents a permanent loss. As identified in Section 2.3 of the EIR, "Mineral Resources," no measures are available that would mitigate impacts associated with the loss of availability of mineral resources. Mineral resources cannot be regenerated or created. An alternative location is not feasible for either preservation of the biological values of the Merriam Mountains or the availability of on-site mineral resources (see Section 2.3).

Potential Environmental Damage from Accidents

There is no foreseeable need for the use of hazardous materials on site during construction or post-construction occupancy. As such, the project would not present an additional or unacceptable risk of irreversible damage from environmental accidents.